

PETER M. HART (Bar No. 198691)  
[hartpeter@msn.com](mailto:hartpeter@msn.com)  
TRAVIS HODGKINS (Bar No. 262063)  
[thodgkins.loph@gmail.com](mailto:thodgkins.loph@gmail.com)  
**LAW OFFICES OF PETER M. HART**  
12121 Wilshire Blvd., Suite 205  
Los Angeles, CA 90025  
Telephone: (310) 478-5789  
Facsimile: (509) 561-6441

KENNETH H. YOON (Bar No. 198443)  
[kyoon@yoonlaw.com](mailto:kyoon@yoonlaw.com)  
STEPHANIE E. YASUDA (Bar No. 265480)  
[syasuda@yoonlaw.com](mailto:syasuda@yoonlaw.com)  
**LAW OFFICES OF KENNETH H. YOON**  
One Wilshire Boulevard, Suite 2200  
Los Angeles, California 90017-3383  
Telephone: (213) 612-0988  
Facsimile: (213) 947-1211

Attorneys for Plaintiff AARON RANGEL

**UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

AARON RANGEL, as an individual  
and on behalf of others similarly  
situated,

Plaintiff,

v.

FEDEX GROUND PACKAGE  
SYSTEM, INC., a Delaware  
Corporation, and DOES 1 through 100,  
inclusive,

Defendant.

Case No. SACV13-01718 DOC (JCGx)

**NOTICE OF MOTION AND  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: Sept. 8, 2014  
Time: 8:30 a.m.  
Crt. Rm.: 9D

**TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

YOU ARE HEREBY NOTIFIED that on September 8, 2014 at 8:30 a.m., or as soon thereafter as the matter can be heard, before the Honorable David O. Carter, United States District Court Judge, in Courtroom 9D of the Southern Division of the U.S. District Court, Central District of California, located at 411 W. Fourth Street, Santa Ana, California 92701, Plaintiff Aaron Rangel ("Plaintiff"), on behalf of himself and all others similarly situated, will and hereby does move the Court for an order:

1. Granting preliminary approval of the class action settlement achieved in this matter;
2. Certifying the Settlement Class;
3. Appointing Plaintiff Aaron Rangel as the Class Representative of the Settlement Class;
4. Appointing Plaintiff's counsel as Class Counsel;
5. Appointing Gilardi & Co. LLC as the Settlement Administrator;
6. Approving as to form and ordering that notice of the settlement be given to the Settlement Class;
7. Setting this matter for hearing on the issues of final approval, approval of Enhancement Award, and approval of Class Counsel's application for attorney's fees and costs;
8. Granting such other and further relief as the Court deems just and proper.

This motion is brought pursuant to Federal Rule of Civil Procedure 23(e) on the grounds that the settlement reached with the Defendant is reasonable, fair, and adequate, achieved as the result of informed, arms-length negotiations, and deserving of approval for the benefit of the Settlement Class to whom it pertains.

This Motion is made following the conference of counsel pursuant to Local Rule 7-3 which took place multiple times, including in-person and by telephone. *See*

1 Declaration of Peter M. Hart ¶ 8.

2 This shall be based upon this Notice of Motion; all pleadings on file in this  
3 matter; the concurrently filed Memorandum of Points and Authorities; the  
4 declarations of Peter M. Hart, Travis Hodgkins, and Kenneth H. Yoon; and the  
5 Court's own records, files, notes, and other documents on file in this matter, as well  
6 as upon all oral and/or documentary evidence as may be properly presented at the  
7 time of the hearing of this matter.  
8

9 DATED: August 11, 2014

LAW OFFICES OF PETER M. HART

12 By: s/ Travis Hodgkins

13 Peter M. Hart  
14 Travis E. Hodgkins  
Attorneys for Plaintiff  
AARON RANGEL